

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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G INVESTORS HOLDING LLC as successors in :
interest to STEPHEN CARB AS TRUSTEE OF :
LOLLYTOGS, INC. TRUST, :
: 09-CV-2980 (RMB)(KNF)

Plaintiff,
vs.

LINCOLN BENEFIT LIFE COMPANY INC.,

Defendant.

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PLAINTIFF'S PROPOSED VERDICT SHEET

Plaintiff G INVESTORS HOLDING LLC as successors in interest to STEPHEN CARB AS TRUSTEE OF LOLLYTOGS, INC. TRUST ("Plaintiff"), respectfully submits the following Proposed Verdict Sheet.

A. Breach of Contract

1. Based upon the law as I have charged you, did the Defendant, by their actions and their representations that these policies will have conversion privileges up to the term of the policy modify the insurance contract thereby creating a conversion privilege under policies?

If the answer is Yes- Proceed No Further.

If the answer is No- Proceed to Question Number 2.

B. Estoppel

2. Based upon the law of estoppel as I have charged you, was the Defendant estopped from denying that these policies will have a conversion privilege up to the term of the policy based upon their actions and their representations that these policies will have conversion privileges up to the term of the policy?

Yes _____ No _____

When you have finished you answers, signal to the Marshal that you are ready to report your verdict to the Court.

Date: _____

Foreperson: _____

Dated: New York, New York
September 12, 2011

WEG AND MYERS, P.C.,
Attorneys for Plaintiff
G INVESTORS HOLDING LLC as
successors in interest to STEPHEN CARB
AS TRUSTEE OF LOLLYTOGS, INC.
TRUST

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